

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SONYA LARSON,

Plaintiff

v.

DAWN DORLAND PERRY,
COHEN BUSINESS LAW GROUP, PC and
JEFFREY A. COHEN, ESQUIRE,

Defendants

C.A. No. 1:19-cv-10203-IT

DAWN DORLAND PERRY,

Plaintiff-in-Counterclaim

v.

SONYA LARSON,

Defendant-in-Counterclaim

**DAWN DORLAND PERRY’S ASSENTED-TO MOTION FOR
LEAVE TO EXCEED PAGE LIMIT**

NOW COMES the Defendant Dawn Dorland Perry (“Ms. Dorland”) to request and move this Court for leave to file a Memorandum of Law in support of her Motion for Summary Judgment in excess of the twenty (20) Page limit set forth in Local Rule 7.1(b)(4). Ms. Dorland seeks leave to file a thirty (30) page memorandum.

As grounds for this motion, Ms. Dorland states as follows:

1. Ms. Dorland will file a motion for summary judgment pursuant to Fed. R. Civ. P. 56 to narrow the issues for trial, or, alternatively, to dispose of this matter without need for trial.

At issue in this action are Plaintiff Sonya Larson's four separate claims against Ms. Dorland, as well as Ms. Dorland's copyright infringement counterclaims against Ms. Larson.

2. An extended memorandum in support of Ms. Dorland's Motion for Summary Judgment will afford Ms. Dorland the opportunity to provide the Court with full briefing of the relevant facts and many legal issues in this action.

3. Namely, there are multiple versions of the work by Ms. Larson titled *The Kindest* at issue in this case, all of which contain an unauthorized copy of the letter written by Ms. Dorland to the final recipient of her kidney donation, or iterations of that letter. Both Ms. Dorland and Ms. Larson have alleged copyright claims against the other.

4. Further, Ms. Larson has alleged intentional interference and defamation tort claims against Ms. Dorland, which arise from separate facts from the copyright claims, and require distinct legal analysis from the copyright claims.

5. Ms. Dorland is undertaking every effort to keep the Memorandum concise and will continue to make these efforts.

WHEREFORE, Ms. Dorland respectfully requests this Court GRANT Ms. Dorland's Motion for Leave to file a thirty-page Memorandum of Law in support of her Motion for Summary Judgment.

Date: October 21, 2022

Respectfully submitted,

PARTRIDGE SNOW & HAHN LLP

/s/Suzanne M. Elovecky

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Attorney for Defendant/Plaintiff-in-Counterclaim Dawn Dorland Perry

L.R. 7.1(a)(2) CERTIFICATE

I certify that on October 20, 2022 I met-and-conferred by email with all counsel for the parties of record to resolve or narrow the issues raised by the foregoing motion. As a result of this meet-and-confer, I obtained all other parties' assent to the requested relief sought hereunder.

/s/Suzanne M. Elovecky

Suzanne M. Elovecky (BBO# 670047)

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of October 2022, this document was filed and served through the ECF system and sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Suzanne M. Elovecky

Suzanne M. Elovecky (BBO #670047)

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